

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION**

COUNTY OF HOPKINS, )  
Plaintiff, )  
vs ) CASE NO. 4:17-cv-845  
PURDUE PHARMA, L.P., ET AL., )  
Defendants. )

**MOTION TO REMAND**

**NOW INTO COURT**, through undersigned counsel, comes Plaintiff to move this Honorable Court to remand this matter to the 62nd District Court of Hopkins County, Texas, for the reasons set forth herein:

I.

On December 12, 2017, Plaintiff received notice of removal to the United States District Court for the Eastern District of Texas by Defendants Endo Heath Solutions Inc. and Endo Pharmaceuticals Inc.

II.

Plaintiff opposes removal and moves for remand back to the state court on the basis that this Court does not have subject matter jurisdiction over this matter. As more fully set forth in the accompanying Memorandum of Points and Authorities in Support, there is not complete diversity in this case because Plaintiff Hopkins County and two defendants in this case are Texas citizens.

**WHEREFORE**, Plaintiff respectfully requests that this matter be remanded to the 62nd District Court of Hopkins County, Texas.

Dated: December 14, 2017

Respectfully submitted,

**SIMON GREENSTONE PANATIER  
BARTLETT, P.C.**

/s/*Jeffrey B. Simon*

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**CERTIFICATE OF CONFERENCE**

I, Amy M. Carter, conferred with Hannah Sibiski, Counsel for Endo Health Solutions Inc., on December 14, 2017, and have made a reasonable effort to reach an agreement about Plaintiff's Motion to Remand. Counsel opposes the motion.

Therefore, this matter is presented to the Court for determination.

/s/Amy M Carter  
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**CERTIFICATE OF SERVICE**

I hereby certify on the 14<sup>th</sup> day of December, 2017, a copy of the foregoing document was served on all counsel of record via the Court's ECF system.

/s/Amy M. Carter  
Amy M. Carter